

# LISKOW & LEWIS

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November 8, 2006

Hon. James H. Welsh  
Commissioner of Conservation  
Office of Conservation  
Post Office Box 94275  
Baton Rouge, Louisiana 70804-4275

Re: Petition for Rehearing – Docket 06-975  
Order No. 439-B-4, dated October 30, 2006  
SBC L WX RA SU, South Bearhead Creek Field  
Beauregard Parish, Louisiana  
Applicant: Swift Energy Operating, L.L.C.  
Hearing held on September 19, 2006

Dear Commissioner Welsh:

On behalf of Swift Energy Operating, L.L.C., unit operator of the SBC L WX RA SU, in South Bearhead Creek Field, Beauregard Parish, Louisiana, we respectfully request that a rehearing be granted in connection with Office of Conservation Order No. 439-B-4, effective September 19, 2006, issued October 30, 2006. The subject order denied Swift's request to dissolve the existing reservoirwide unit and to simultaneously create a revised reservoirwide unit for the Lower Wilcox Zone, Reservoir A, in the South Bearhead Creek Field, because there was "insufficient evidence submitted by the applicant" to justify the requested revision.

Rehearings must be requested within 10 days of the entry of the order; thus, this request for rehearing has been timely filed. It is the applicant's opinion that the subject order is "clearly contrary to the law and the evidence" presented at this uncontested hearing, making the granting of a rehearing appropriate under La. R.S. 49:959A(1). The applicant filed for unit revision after successfully completing its Krause and Managan No. 1 Well (the "subject well") outside the existing unit. We believe it is clear that this well is in fact in the Lower Wilcox Zone, Reservoir A. Swift is fully convinced that its

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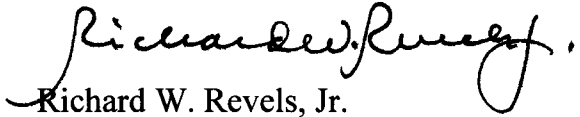
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proposed revision is appropriate and supported by the evidence submitted at the hearing. To the extent the denial order resulted in whole or part from a perceived incompleteness or inaccuracy in the technical exhibits or evidence Swift presented at the hearing, we humbly apologize. In an uncontested hearing, often the applicant's presentation is abbreviated in the interest of time and economy. As a matter of fairness to all interested parties, however, we trust that any technical shortcomings in Swift's presentation will not prevent the existing unit from being revised in a manner which includes the subject well. Thus, should you and your staff conclude that there is sufficient evidence to justify revision of the subject unit so as to include the subject well in a revised unit, but that the unit proposal of Swift should not be adopted in its entirety, we respectfully request that a State Exhibit "A" be issued, revising the subject unit as you deem appropriate. The subject unit has been producing from the unitized interval for several months and funds have been escrowed pending the outcome of the unitization proceedings. Swift will, of course, disburse these funds in accordance with any final order ultimately issued.

Thank you very much for your consideration.

Very truly yours,

LISKOW & LEWIS

  
Richard W. Revels, Jr.

RWRjr/df

cc: Mr. Richard Hudson, Lafayette District Office of Conservation  
Interested Owners, Represented Parties and Interested Parties

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